

UNED

2/10/04

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Civil

X :  
BRUCE RIGGS, Individually, and on Behalf of :  
All Others Similarly Situated, :  
Plaintiff, : Civ. No. 03 CV 12500 (WGY)  
vs. :  
MASSACHUSETTS FINANCIAL SERVICES :  
COMPANY, MFS INVESTMENT :  
MANAGEMENT, SUN LIFE FINANCIAL, INC., :  
MFS SERIES TRUST I, MFS SERIES TRUST II, :  
MFS SERIES TRUST III, MFS SERIES TRUST IV, :  
MFS SERIES TRUST V, MFS SERIES TRUST VI, :  
MFS SERIES TRUST VII, MFS SERIES TRUST :  
VIII, MFS SERIES TRUST IX, MFS SERIES :  
TRUST X, MFS SERIES TRUST XI, MFS :  
CAPITAL OPPORTUNITIES FUND, MFS CORE :  
GROWTH FUND, MFS LARGE CAP GROWTH :  
FUND, MFS MANAGED SECTORS FUND, MFS :  
MID CAP GROWTH FUND, MFS NEW :  
DISCOVERY FUND, MFS NEW ENDEAVOR :  
FUND, MFS RESEARCH FUND, MFS :  
STRATEGIC GROWTH FUND, MFS :  
TECHNOLOGY FUND, MASSACHUSETTS :  
INVESTORS GROWTH STOCK, MFS MID CAP :  
VALUE FUND, MFS RESEARCH GROWTH :  
AND INCOME FUND, MFS TOTAL RETURN :  
FUND, MFS UNION STANDARD EQUITY FUND, :  
MFS UTILITIES FUND, MFS VALUE FUND, :  
:

[Caption continued on next page]

**MOTION OF THE BURRELL PROPOSED LEAD PLAINTIFFS FOR  
CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFFS  
AND APPROVAL OF SELECTION OF LEAD AND LIAISON COUNSEL**

MASSACHUSETTS INVESTORS TRUST, MFS :  
AGGRESSIVE GROWTH ALLOCATION FUND, :  
MFS CONSERVATIVE ALLOCATION FUND, :  
MFS MODERATE ALLOCATION FUND, MFS :  
BOND FUND, MFS EMERGING MARKETS :  
DEBT FUND, MFS GOVERNMENTAL :  
LIMITED MATURITY FUND, MFS :  
GOVERNMENT MORTGAGE FUND, MFS :  
GOVERNMENT SECURITIES FUND, MFS :  
HIGH INCOME FUND, MFS HIGH YIELD :  
OPPORTUNITIES FUND, BOND FUND, MFS :  
LIMITED MATURITY FUND, MFS RESEARCH :  
BOND FUND, MFS STRATEGIC INCOME FUND, :  
MFS ALABAMA MUNICIPAL BOND FUND, :  
MFS ARKANSAS MUNICIPAL BOND FUND, :  
MFS CALIFORNIA MUNICIPAL BOND FUND, :  
MFS FLORIDA MUNICIPAL BOND FUND, MFS :  
GEORGIA MUNICIPAL BOND FUND, MFS :  
MARYLAND MUNICIPAL BOND FUND, MFS :  
MASSACHUSETTS MUNICIPAL BOND FUND, :  
MFS MISSISSIPPI MUNICIPAL BOND FUND, :  
MFS MUNICIPAL BOND FUND, MFS :  
MUNICIPAL LIMITED MATURITY FUND, :  
MFS NEW YORK MUNICIPAL BOND FUND, :  
MFS NORTH CAROLINA MUNICIPAL BOND :  
FUND, MFS PENNSYLVANIA MUNICIPAL :  
BOND FUND, MFS SOUTH CAROLINA :  
MUNICIPAL BOND FUND, MFS TENNESSEE :  
MUNICIPAL BOND FUND, MFS VIRGINIA :  
MUNICIPAL BOND FUND, MFS WEST :  
VIRGINIA MUNICIPAL BOND FUND, MFS :  
EMERGING MARKETS EQUITY FUND, MFS :  
GLOBAL EQUITY FUND, MFS GLOBAL :  
GROWTH FUND, MFS GLOBAL TOTAL :  
RETURN FUND, MFS INTERNATIONAL :  
GROWTH FUND, MFS INTERNATIONAL :  
NEW DISCOVERY FUND, MFS :  
INTERNATIONAL VALUE FUND, MFS :  
RESEARCH INTERNATIONAL FUND, MFS :  
SERIES TRUST VII and ALL DEFENDANTS, :  
Defendants. :  
:

X

[Additional Captions Set Forth Below]

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OLIVER S. TRONE, Individually, and on Behalf of :  
All Others Similarly Situated, :  
Plaintiff, : Civ. No. 03 CV 12514 (WGY)  
vs. :  
MFS CAPITAL OPPORTUNITIES FUND, MFS :  
CORE GROWTH FUND, MFS LARGE CAP :  
GROWTH FUND, MFS MANAGED SECTORS :  
FUND, MFS MID CAP GROWTH FUND, MFS :  
NEW DISCOVERY FUND, MFS NEW :  
ENDEAVOR FUND, MFS RESEARCH FUND, :  
MFS STRATEGIC GROWTH FUND, MFS :  
TECHNOLOGY FUND, MASSACHUSETTS :  
INVESTORS GROWTH STOCK, MFS MID CAP :  
VALUE FUND, MFS RESEARCH GROWTH :  
AND INCOME FUND, MFS TOTAL RETURN :  
FUND, MFS UNION STANDARD EQUITY FUND, :  
MFS UTILITIES FUND, MFS VALUE FUND, :  
MASSACHUSETTS INVESTORS TRUST, MFS :  
AGGRESSIVE GROWTH ALLOCATION FUND, :  
MFS CONSERVATIVE ALLOCATION FUND, :  
MFS MODERATE ALLOCATION FUND, MFS :  
BOND FUND, MFS EMERGING MARKETS :  
DEBT FUND, MFS GOVERNMENTAL :  
LIMITED MATURITY FUND, MFS :  
GOVERNMENT MORTGAGE FUND, MFS :  
GOVERNMENT SECURITIES FUND, MFS :  
HIGH INCOME FUND, MFS HIGH YIELD :  
OPPORTUNITIES FUND, BOND FUND, MFS :  
LIMITED MATURITY FUND, MFS RESEARCH :  
BOND FUND, MFS STRATEGIC INCOME FUND, :  
MFS ALABAMA MUNICIPAL BOND FUND, :  
MFS ARKANSAS MUNICIPAL BOND FUND, :  
MFS CALIFORNIA MUNICIPAL BOND FUND, :  
MFS FLORIDA MUNICIPAL BOND FUND, MFS :  
GEORGIA MUNICIPAL BOND FUND, MFS :  
MARYLAND MUNICIPAL BOND FUND, MFS :  
MASSACHUSETTS MUNICIPAL BOND FUND, :  
MFS MISSISSIPPI MUNICIPAL BOND FUND, :

MFS MUNICIPAL BOND FUND, MFS :  
MUNICIPAL LIMITED MATURITY FUND, :  
MFS NEW YORK MUNICIPAL BOND FUND, :  
MFS NORTH CAROLINA MUNICIPAL BOND :  
FUND, MFS PENNSYLVANIA MUNICIPAL :  
BOND FUND, MFS SOUTH CAROLINA :  
MUNICIPAL BOND FUND, MFS TENNESSEE :  
MUNICIPAL BOND FUND, MFS VIRGINIA :  
MUNICIPAL BOND FUND, MFS WEST :  
VIRGINIA MUNICIPAL BOND FUND, MFS :  
EMERGING MARKETS EQUITY FUND, MFS :  
GLOBAL EQUITY FUND, MFS GLOBAL :  
GROWTH FUND, MFS GLOBAL TOTAL :  
RETURN FUND, MFS INTERNATIONAL :  
GROWTH FUND, MFS INTERNATIONAL :  
NEW DISCOVERY FUND, MFS :  
INTERNATIONAL VALUE FUND, MFS :  
RESEARCH INTERNATIONAL FUND, MFS :  
CASH RESERVE FUND, MFS GOVERNMENT :  
MONEY MARKET FUND, MFS MONEY :  
MARKET FUND, MFS MUNICIPAL SERIES :  
TRUST, MFS SERIES TRUST I, MFS SERIES :  
TRUST II, MFS SERIES TRUST III, MFS SERIES :  
TRUST IV, MFS SERIES TRUST V, MFS SERIES :  
TRUST VI, MFS SERIES TRUST VII, MFS SERIES:  
TRUST VIII, MFS SERIES TRUST IX, MFS :  
SERIES TRUST X, MFS SERIES TRUST XI, SUN :  
LIFE FINANCIAL, INC., JOHN DOES 1-100, and :  
ALL DEFENDANTS, :  
  
Defendants. :  
-----X

-----X  
DANIELLE ADAMS and :  
DEAN DELLAVENTURA, Individually, and on :  
Behalf of All Others Similarly Situated, :  
Plaintiff, : Civ. No. 03 CV 12536 (WGY)  
vs. :  
MFS CAPITAL OPPORTUNITIES FUND, MFS :  
CORE GROWTH FUND, MFS LARGE CAP :  
GROWTH FUND, MFS MANAGED SECTORS :  
FUND, MFS MID CAP GROWTH FUND, MFS :  
NEW DISCOVERY FUND, MFS NEW :  
ENDEAVOR FUND, MFS RESEARCH FUND, :  
MFS STRATEGIC GROWTH FUND, MFS :  
TECHNOLOGY FUND, MASSACHUSETTS :  
INVESTORS GROWTH STOCK, MFS MID CAP :  
VALUE FUND, MFS RESEARCH GROWTH :  
AND INCOME FUND, MFS TOTAL RETURN :  
FUND, MFS UNION STANDARD EQUITY FUND, :  
MFS UTILITIES FUND, MFS VALUE FUND, :  
MASSACHUSETTS INVESTORS TRUST, MFS :  
AGGRESSIVE GROWTH ALLOCATION FUND, :  
MFS CONSERVATIVE ALLOCATION FUND, :  
MFS MODERATE ALLOCATION FUND, MFS :  
BOND FUND, MFS EMERGING MARKETS :  
DEBT FUND, MFS GOVERNMENTAL :  
LIMITED MATURITY FUND, MFS :  
GOVERNMENT MORTGAGE FUND, MFS :  
GOVERNMENT SECURITIES FUND, MFS :  
HIGH INCOME FUND, MFS HIGH YIELD :  
OPPORTUNITIES FUND, BOND FUND, MFS :  
LIMITED MATURITY FUND, MFS RESEARCH :  
BOND FUND, MFS STRATEGIC INCOME FUND, :  
MFS ALABAMA MUNICIPAL BOND FUND, :  
MFS ARKANSAS MUNICIPAL BOND FUND, :  
MFS CALIFORNIA MUNICIPAL BOND FUND, :  
MFS FLORIDA MUNICIPAL BOND FUND, MFS :  
GEORGIA MUNICIPAL BOND FUND, MFS :  
MARYLAND MUNICIPAL BOND FUND, MFS :

MASSACHUSETTS MUNICIPAL BOND FUND, :  
MFS MISSISSIPPI MUNICIPAL BOND FUND, :  
MFS MUNICIPAL BOND FUND, MFS :  
MUNICIPAL LIMITED MATURITY FUND, :  
MFS NEW YORK MUNICIPAL BOND FUND, :  
MFS NORTH CAROLINA MUNICIPAL BOND :  
FUND, MFS PENNSYLVANIA MUNICIPAL :  
BOND FUND, MFS SOUTH CAROLINA :  
MUNICIPAL BOND FUND, MFS TENNESSEE :  
MUNICIPAL BOND FUND, MFS VIRGINIA :  
MUNICIPAL BOND FUND, MFS WEST :  
VIRGINIA MUNICIPAL BOND FUND, MFS :  
EMERGING MARKETS EQUITY FUND, MFS :  
GLOBAL EQUITY FUND, MFS GLOBAL :  
GROWTH FUND, MFS GLOBAL TOTAL :  
RETURN FUND, MFS INTERNATIONAL :  
GROWTH FUND, MFS INTERNATIONAL :  
NEW DISCOVERY FUND, MFS :  
INTERNATIONAL VALUE FUND, MFS :  
RESEARCH INTERNATIONAL FUND, MFS :  
CASH RESERVE FUND, MFS GOVERNMENT :  
MONEY MARKET FUND, MFS MONEY :  
MARKET FUND, MFS MUNICIPAL SERIES :  
TRUST, MFS SERIES TRUST I, MFS SERIES :  
TRUST II, MFS SERIES TRUST III, MFS SERIES :  
TRUST IV, MFS SERIES TRUST V, MFS SERIES :  
TRUST VI, MFS SERIES TRUST VII, MFS SERIES :  
TRUST VIII, MFS SERIES TRUST IX, MFS :  
SERIES TRUST X, MFS SERIES TRUST XI, SUN :  
LIFE FINANCIAL, INC., MASSACHUSETTS :  
FINANCIAL SERVICES COMPANY DBA MFS :  
INVESTMENT MANAGEMENT, and JOHN DOES :  
1-100 :  
Defendants. :  
-----X

-----X  
STEVEN GREENBERG, on Behalf of Himself and :  
All Others Similarly Situated, :  
Plaintiff, : Civ. No. 03 CV 12545 (WGY)  
vs. :  
MASSACHUSETTS FINANCIAL SERVICES :  
COMPANY, MFS SERIES TRUST I, MFS SERIES :  
TRUST II, MFS SERIES TRUST III, MFS SERIES :  
TRUST IV, MFS SERIES TRUST V, MFS SERIES :  
TRUST VI, MFS SERIES TRUST VII, MFS SERIES :  
TRUST VIII, MFS SERIES TRUST IX, MFS :  
SERIES TRUST X, and MFS SERIES TRUST XI, :  
Defendants. :  
-----X

-----X	
JACOB ELEPHANT, on Behalf of Himself and	:
All Others Similarly Situated,	:
	:
Plaintiff,	Civ. No. 03 CV 12570 (WGY)
	:
vs.	:
	:
MASSACHUSETTS FINANCIAL SERVICES	:
COMPANY, MFS INVESTMENT	:
MANAGEMENT, SUN LIFE FINANCIAL, INC.,	:
MFS SERIES TRUST I, MFS SERIES TRUST II,	:
MFS SERIES TRUST III, MFS SERIES TRUST IV,	:
MFS SERIES TRUST V, MFS SERIES TRUST VI,	:
MFS SERIES TRUST VII, MFS SERIES TRUST	:
VIII, MFS SERIES TRUST IX, MFS SERIES	:
TRUST X, MFS SERIES TRUST XI, MFS	:
CAPITAL OPPORTUNITIES FUND, MFS CORE	:
GROWTH FUND, MFS LARGE CAP GROWTH	:
FUND, MFS MANAGED SECTORS FUND, MFS	:
MID CAP GROWTH FUND, MFS NEW	:
DISCOVERY FUND, MFS NEW ENDEAVOR	:
FUND, MFS RESEARCH FUND, MFS	:
STRATEGIC GROWTH FUND, MFS	:
TECHNOLOGY FUND, MASSACHUSETTS	:
INVESTORS GROWTH STOCK, MFS MID CAP	:
VALUE FUND, MFS RESEARCH GROWTH	:
AND INCOME FUND, MFS TOTAL RETURN	:
FUND, MFS UNION STANDARD EQUITY FUND,	:
MFS UTILITIES FUND, MFS VALUE FUND,	:
MASSACHUSETTS INVESTORS TRUST, MFS	:
AGGRESSIVE GROWTH ALLOCATION FUND,	:
MFS CONSERVATIVE ALLOCATION FUND,	:
MFS MODERATE ALLOCATION FUND, MFS	:
BOND FUND, MFS EMERGING MARKETS	:
DEBT FUND, MFS GOVERNMENTAL	:
LIMITED MATURITY FUND, MFS	:
GOVERNMENT MORTGAGE FUND, MFS	:
GOVERNMENT SECURITIES FUND, MFS	:
HIGH INCOME FUND, MFS HIGH YIELD	:
OPPORTUNITIES FUND, BOND FUND, MFS	:

LIMITED MATURITY FUND, MFS RESEARCH :  
BOND FUND, MFS STRATEGIC INCOME FUND, :  
MFS ALABAMA MUNICIPAL BOND FUND, :  
MFS ARKANSAS MUNICIPAL BOND FUND, :  
MFS CALIFORNIA MUNICIPAL BOND FUND, :  
MFS FLORIDA MUNICIPAL BOND FUND, MFS :  
GEORGIA MUNICIPAL BOND FUND, MFS :  
MARYLAND MUNICIPAL BOND FUND, MFS :  
MASSACHUSETTS MUNICIPAL BOND FUND, :  
MFS MISSISSIPPI MUNICIPAL BOND FUND, :  
MFS MUNICIPAL BOND FUND, MFS :  
MUNICIPAL LIMITED MATURITY FUND, :  
MFS NEW YORK MUNICIPAL BOND FUND, :  
MFS NORTH CAROLINA MUNICIPAL BOND :  
FUND, MFS PENNSYLVANIA MUNICIPAL :  
BOND FUND, MFS SOUTH CAROLINA :  
MUNICIPAL BOND FUND, MFS TENNESSEE :  
MUNICIPAL BOND FUND, MFS VIRGINIA :  
MUNICIPAL BOND FUND, MFS WEST :  
VIRGINIA MUNICIPAL BOND FUND, MFS :  
EMERGING MARKETS EQUITY FUND, MFS :  
GLOBAL EQUITY FUND, MFS GLOBAL :  
GROWTH FUND, MFS GLOBAL TOTAL :  
RETURN FUND, MFS INTERNATIONAL :  
GROWTH FUND, MFS INTERNATIONAL :  
NEW DISCOVERY FUND, MFS :  
INTERNATIONAL VALUE FUND, MFS :  
RESEARCH INTERNATIONAL FUND, JOHN :  
DOES 1-100, and MFS FUNDS :  
Defendants. :  
-----X

-----X  
YAKOV BURSTEIN, Individually and on Behalf of :  
All Others Similarly Situated, :  
Plaintiff, : Civ. No. 03 CV 12622 (WGY)  
vs. :  
MFS GLOBAL TELECOMMUNICATIONS FUND, :  
CAPITAL OPPORTUNITIES FUND, MFS CORE :  
GROWTH FUND, MFS LARGE CAP GROWTH :  
FUND, MFS MANAGED SECTORS FUND, MFS :  
MID CAP GROWTH FUND, MFS NEW :  
DISCOVERY FUND, MFS NEW ENDEAVOR :  
FUND, MFS RESEARCH FUND, MFS :  
STRATEGIC GROWTH FUND, MFS :  
TECHNOLOGY FUND, MASSACHUSETTS :  
INVESTORS GROWTH STOCK, MFS MID CAP :  
VALUE FUND, MFS RESEARCH GROWTH :  
AND INCOME FUND, MFS TOTAL RETURN :  
FUND, MFS UNION STANDARD EQUITY FUND, :  
MFS UTILITIES FUND, MFS VALUE FUND, :  
MASSACHUSETTS INVESTORS TRUST, MFS :  
AGGRESSIVE GROWTH ALLOCATION FUND, :  
MFS CONSERVATIVE ALLOCATION FUND, :  
MFS MODERATE ALLOCATION FUND, MFS :  
BOND FUND, MFS EMERGING MARKETS :  
DEBT FUND, MFS GOVERNMENTAL :  
LIMITED MATURITY FUND, MFS :  
GOVERNMENT MORTGAGE FUND, MFS :  
GOVERNMENT SECURITIES FUND, MFS :  
HIGH INCOME FUND, MFS HIGH YIELD :  
OPPORTUNITIES FUND, BOND FUND, MFS :  
LIMITED MATURITY FUND, MFS RESEARCH :  
BOND FUND, MFS STRATEGIC INCOME FUND, :  
MFS ALABAMA MUNICIPAL BOND FUND, :  
MFS ARKANSAS MUNICIPAL BOND FUND, :  
MFS CALIFORNIA MUNICIPAL BOND FUND, :  
MFS FLORIDA MUNICIPAL BOND FUND, MFS :  
GEORGIA MUNICIPAL BOND FUND, MFS :  
MARYLAND MUNICIPAL BOND FUND, MFS :

MASSACHUSETTS MUNICIPAL BOND FUND,	:
MFS MISSISSIPPI MUNICIPAL BOND FUND,	:
MFS MUNICIPAL BOND FUND, MFS	:
MUNICIPAL LIMITED MATURITY FUND,	:
MFS NEW YORK MUNICIPAL BOND FUND,	:
MFS NORTH CAROLINA MUNICIPAL BOND	:
FUND, MFS PENNSYLVANIA MUNICIPAL	:
BOND FUND, MFS SOUTH CAROLINA	:
MUNICIPAL BOND FUND, MFS TENNESSEE	:
MUNICIPAL BOND FUND, MFS VIRGINIA	:
MUNICIPAL BOND FUND, MFS WEST	:
VIRGINIA MUNICIPAL BOND FUND, MFS	:
EMERGING MARKETS EQUITY FUND, MFS	:
GLOBAL EQUITY FUND, MFS GLOBAL	:
GROWTH FUND, MFS GLOBAL TOTAL	:
RETURN FUND, MFS INTERNATIONAL	:
GROWTH FUND, MFS INTERNATIONAL	:
NEW DISCOVERY FUND, MFS	:
INTERNATIONAL VALUE FUND, MFS	:
RESEARCH INTERNATIONAL FUND, MFS	:
CASH RESERVE FUND, MFS GOVERNMENT	:
MONEY MARKET FUND, MFS	:
GOVERMENT MONEY MARKET FUND, MFS	:
FUNDS, MFS MUNICIPAL SERIES TRUST,	:
MFS SERIES TRUST I, MFS SERIES TRUST II,	:
MFS SERIES TRUST III, MFS SERIES TRUST IV,	:
MFS SERIES TRUST V,MFS SERIES TRUST VII,	:
MFS SERIES TRUST VIII, MFS SERIES TRUST	:
IX, MFS SERIES TRUST X, MFS SERIES TRUST	:
XI, MFS FUND REGISTRANTS, SUN LIFE	:
FINANCIAL, INC., MASSACHUSETTS	:
FINANCIAL SERVICES COMPANY DBA MFS	:
INVESTMENT MANAGEMENT, JOHN DOES	:
1-100, MFS and SERIES TRUST VI,	:
	:
Defendants.	:

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X

Movants (as defined in the accompanying Memorandum of Law), through their undersigned counsel, hereby move this Court for an order: (i) consolidating the related actions filed on behalf MFS Mutual Fund Purchasers, Redeemers or Holders, for violations of Sections 10(b) and 20(a) of the Securities Exchange Act of 1934 (the "Exchange Act"), 15 U.S.C.

§§78j(b) and 78t(a), Rule 10b-5 promulgated thereunder, 17 C.F.R. §240.10b-5, Sections 11 and 15 of the Securities Act of 1933, and Sections 34 and 36 of the Investment Company Act., pursuant to Rule 42 of the Federal Rules of Civil Procedure; (ii) appointing Movants as Lead Plaintiffs on behalf of purchasers of MFS Mutual Funds, and (iii) approving Movants' selection of Stull, Stull & Brody and Weiss & Yourman as Lead Counsel and Gilman & Pastor, LLP as Liaison Counsel.

The Motion is brought on the grounds that the actions filed against MFS Company are substantially identical because each alleges claims for violations of Sections 10(b) and 20(a) of the Securities Exchange Act of 1934 (the "Exchange Act"), 15 U.S.C. §§78j(b) and 78t(a), Rule 10b-5 promulgated thereunder, 17 C.F.R. §240.10b-5, Sections 11 and 15 of the Securities Act of 1933, and Sections 34 and 36 of the Investment Company Act, and is based upon the same factual allegations against substantially the same defendants. In addition, consolidation of these cases will promote efficiency.

The Motion is also made on the grounds that Movants meet the requirements of Rule 23 of the Federal Rules of Civil Procedure because their claims are typical of class members' claims and they each will fairly and adequately represent the Class.

The facts and law supporting the Motion are fully set forth in the accompanying Memorandum of Law in Support of the Burrell Proposed Lead Plaintiffs' Motion for Consolidation of Related Cases, Appointment as Lead Plaintiffs, and Approval of Lead Plaintiffs' Choice of Lead and Liaison Counsel.

Dated: February 9, 2004

Respectfully submitted,

**GILMAN AND PASTOR, LLP**

By: David Pastor

David Pastor (BBO #391000)  
Stonehill Corporate Center  
999 Broadway, Suite 500  
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(781) 231-7850

**Proposed Liaison Counsel  
For Plaintiffs and the Class**

**STULL, STULL & BRODY**

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**WEISS & YOURMAN**

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David C. Katz  
Jack I. Zwick  
551 Fifth Avenue, Suite 1600  
New York, NY 10176  
(212) 682-3025

**Proposed Lead Counsel For  
Plaintiffs and The Class**

**CERTIFICATE OF SERVICE**

I Hereby Certify That A True Copy of  
The Above Document Was Served Upon  
The Attorney Of Record For Each Other  
Party By Mail (By Hand) On 2/9/04  
David Pastor